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7	Attorneys for the Federal Defendants		
8	UNITED STATES DISTRICT COURT		
10	Alberto Mpiana Da Mesquita E Melo,	Case No. 2:24-cv-01030-JAD-EJY	
11	Plaintiff,	Joint Stipulation and Order to	
12	v.	Stay the Proceedings (Fifth Request)	
13	U.S. Citizenship and Immigration Services (USCIS), et al.,		
14	Defendant.	ECF No. 25	
15	Defendant.		
16	Plaintiff and Defendants, through their	undersigned counsel, hereby stipulate and	
17	jointly request that the Court stay all deadlines in this matter and hold this case in abeyand		
18	for an additional period of 30 days, or until Ap	oril 6, 2025.	
19	The subject of this litigation concerns P	laintiff's I-485 application for adjustment of	
20	status and I-601 application for waiver of grou	nds of inadmissibility. Plaintiff asserts	
21	Defendants have unduly delayed the processing	g of his I-485 and I-601 applications.	
22	The parties have conferred and may res	solve this matter without continued litigation	
23	Since the last stay was granted, Defendants red	opened Plaintiff's administrative applications	
24	and granted his I-601 application. Plaintiff's I-	485 application remains pending.	
25	Plaintiff, through his counsel, is in the 1	process of preparing a parole request for	
26	submission to a third-party agency, the outcome of which may determine the outcome of		
27	his I-485 application. Defendants have also requested briefing from Plaintiff to address		
28	certain issues in his pending I-485 application	The parties thus request an extension of the	

stay in the district court proceedings to allow the parties an opportunity to pursue Plaintiff's parole request and conclude the administrative process. Pending the conclusion of the remaining administrative processing of Plaintiff's I-485 application and parole request, this litigation may become moot.

This is the fifth request to stay the proceedings. This request is not sought for purposes of delay or any other improper purpose, but to facilitate the parties' efforts to resolve the matter in a "just, speedy, and inexpensive" manner consistent with Fed. R. Civ. P. 1. The parties reserve the ability to seek additional time to finalize resolution, if

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1	Respectfully submitted this 10th day of March 2025.	
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3	SULL & ASSOCIATES, PLLC. SUE FAHAMI Acting United States Attorney	
4	/s/ Hardeep Sull /s/ Christian R. Ruiz HARDEEP SULL CHRISTIAN R. RUIZ	_
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12	Suite 661472 Los Angeles, CA 90066	
13	(310) 691-9373 carlo@carlobrooks.com	
14	Attorneys for Plaintiff	
15		
16	ORDER	
17	Based on the parties' stipulation [ECF No. 25] and good cause appearing, IT I	[S
17 18		S
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